



## Department of Environmental Protection

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June 27, 2016

Richard Taikowski  
Pittsfield Generating Company, LP  
235 Merrill Road  
Pittsfield, MA 01201

Re: 310 CMR 7.00 – APPENDIX C  
Appl. #1-O-10-038; Trans. #X234968  
PROPOSED RENEWAL OPERATING PERMIT

Dear Mr. Taikowski:

In accordance with 310 CMR 7.00—APPENDIX C(6) of the Air Pollution Control Regulations ("the Regulations"), the Department of Environmental Protection ("MassDEP") is forwarding to EPA the attached Proposed Operating Permit for Pittsfield Generating Company, LP facility located in Pittsfield, Massachusetts.

Public notice of the Draft Operating Permit was published by the MassDEP in the Berkshire Eagle on January 31, 2015 and in The Environmental Monitor on February 11, 2015, in accordance with the requirements of 310 CMR 7.00: Appendix C. As such, the public comment period ended on March 13, 2015. During that period, no public hearing was requested pursuant to 310 CMR 7.00: Appendix C(6)(f). Comments were received from Pittsfield Generating Company, LP. The comments are listed below and have been addressed in this Proposed Operating Permit as follows (MassDEP's response in ***Bolded Italics***):

1. Condition #3 of Table 4a does not reflect the permitted language for the required operation of the COMS. Opacity monitoring at Pittsfield Generating is only required when the facility is burning fuel oil. In accordance with Provision D.1. of the facility 310 CMR 7.02(2) a. Conditional Approval (Application #1-P-95-011; Transmittal #78319: Consolidation of Amendments and Minor Modifications) Opacity Monitoring is only required when the facility is burning fuel oil. This provision was carried over to the original September 3, 1999 Title V Operating Permit for the facility (Appl. #1-O-95-001; Trans. #108048; Table 4a, EU 1, 2, 3 Provision 1) and the April 19, 2006 renewal (Appl. #1-O-04-010; Trans. #W048856; Table 4a, EU 1, 2, 3 Provision 3). MassDEP approved the above referenced provisions in the facility 310 CMR 7.02 permit (and subsequent amendments) and in the facility Title V permit (and subsequent renewals), in accordance with 310 CMR 7.00 Appendix C(9)(b)3 the Department has already deemed the requirement to operate the COMS only when firing fuel oil as appropriate. Pittsfield Generating

Company is therefore requesting that the MassDEP restore the original requirement that limits the operation of the COMs to when gas turbines are operating on fuel oil as follows:.

*In accordance with DEP Approval #1-P-95-011 (6/8/95 & 11/27/95) and Regulation 310 CMR 7.00 Appendix C(9)(b)3., ensure that the flue gas COMS operates at all times the emission unit is operating on fuel oil except for periods of COMs QA/QC activities, maintenance and repair. Except for periods of QA/QC activities, maintenance and repair, in all cases obtain valid data for at least 90% of the hours per calendar quarter during which the emission unit is operating.*

*As shown in TVOP #1-O-04-010, Transmittal # W048856, Table 4a, condition #3, issued 4/19/06, MassDEP required the continuous opacity monitor(COM) to operate at all times the emission unit(EU #1, #2, and #3) is operating and when natural gas is being fired. This condition was a modification from the original condition contained in #1-O-95-001; Trans. #108048, Table 4a, condition #1, issued 9/3/99, which required the COM to operate only when combusting fuel oil. MassDEP has the authority to require additional monitoring in operating permits pursuant to Regulation 310 CMR 7.00 Appendix C(9)(b)3.*

*More than 10 years since TVOP #1-O-04-010 was issued, the facility is requesting that the operation of the COM should revert back to when only fuel oil is being combusted. Since the facility has been required to operate the COM at all times that the emission unit has operated since 4/19/06, MassDEP does not see a benefit to restricting the COMs operation to only periods of fuel oil combustion. However, MassDEP will allow the operation of the COM to revert back to how the COM was originally required to operate in accordance with Approval #1-P-95-011 (6/8/95 & 11/27/95). This decision is based on a review of COM operations at similar facilities. Therefore, MassDEP has revised TVOP #1-O-10-038, Table 4a, condition #3 to state the following:*

*In accordance with DEP Approval #1-P-95-011 (6/8/95 & 11/27/95) and Regulation 310 CMR 7.00 Appendix C(9)(b)3., ensure that the flue gas COMS operates at all times the emission unit is operating on fuel oil, except for periods of COMs QA/QC activities, maintenance and repair. Except for periods of QA/QC activities, maintenance and repair, in all cases obtain valid data for at least 90% of the hours per calendar quarter during which the emission unit is operating.*

2. Condition #7 of Table 4a is a modification to the existing Title V permit and underlying permits that requires the CEM “to obtain valid data for at least 90% of the hours per calendar quarter during which the emission unit is operating”. A modification to this provision was not requested by Pittsfield Generating Company and does not reflect either the regulatory or permitted requirements for the NOx or NH3 CEMS use, maintenance or installation. The proposed requirement in the DRAFT permit also reflects a change to the requirements of the CO CEMS, but Pittsfield Generating agrees that 310 CMR 7.19(13) is applicable to the CO CEMS.

For the NOX CEMS, MassDEP regulation 310 CMR 7.19(13)(b) provides that “any person required to monitor NOx emissions (i.e., through Non Ox concentrations and the associated diluent concentrations) pursuant to 40 CFR 75, 310 CMR 7.27 or 310 CMR 7.28 shall use the procedures contained either therein **or** in 310 CMR 7.19(13)(b)1. through (b)12. to gather and analyze data and provide quality assurance and quality control in order to determine compliance with 310 CMR 7.19”. Pittsfield Generating Company operates the NOx CEMS in compliance with 40 CFR Part 75 and therefore has the regulatory option under 310 CMR 7.19(13)(b) to comply with those more stringent requirements rather than 310 CMR 7.19(13)(b)1. through (b)12.

In addition, Section I of the facility's NO<sub>x</sub> RACT Emission Control Plan Approval dated September 15, 1994 (Appl. # 1-B-94-032; Trans. #75867) states that *"The installation of the turbines was approved by the Department with a NO<sub>x</sub> emission limit well below the NO<sub>x</sub> RACT requirement (NO<sub>x</sub>: gas 9ppmvd, oil 12 ppmvd). The approval also requires a certified emission monitoring system which meets or exceeds the monitoring, recordkeeping and reporting requirements specified in the NO<sub>x</sub> RACT requirements. Altresco [PGC] shall remain subject to the more stringent requirements in the Plan Approval 1-P-93-016 dated August 26, 1993 as specified in 310 CMR 7.19(2)(e)."*

Lastly, the current and DRAFT Title V permits contain several provisions to assure the quality of the data from the CEMS and the requirement to maintain the CEMS in accordance with Part 75.

The NH<sub>3</sub> CEMS is not applicable to the requirements in 310 CMR 7.19. The current permit contains provisions for the use, maintenance and installation of the CEMS.

Pittsfield Generating Company is therefore requesting that the MassDEP restore the original requirement providing conditions on the availability of the NO<sub>x</sub> and NH<sub>3</sub> CEMS as follows:

*In accordance with DEP Approval # 1-P-95-011 (6/8/95 and 11/27/95) and 310 CMR 7.00 Appendix C(9)(b)3, ensure that the flue gas NO<sub>x</sub> and NH<sub>3</sub> CEMS equipment operates at all times the emission unit is operating, except for periods of CEMS QA/QC activities, maintenance and repair. Except for periods of QA/QC activities, maintenance and repair, in all cases obtain valid data for at least 90% of the hours per calendar quarter during which the emission unit is operating.*

In accordance with 310 CMR 7.00 Appendix C(9)(b)3, MassDEP approved the above referenced provision in conjunction with several other provisions related to the CEMS in the facility 310 CMR 7.02 permit (and subsequent amendments), the NO<sub>x</sub> RACT Emission Control Plan and in the facility Title V permit (and subsequent renewals). The Department has already concluded that these provisions on the use of the CEMS are appropriate pursuant to 310 CMR 7.00 Appendix C(9)(b)3.

Pittsfield Generating also requests that the MassDEP revise the Table 4a Provisions 7 in the DRAFT permit for the CO CEMS as follows:

*In accordance with 310 CMR 7.19(13)(b)10 and 310 CMR 7.00 Appendix C(9)(b)3, operate each CO CEM system at all times the emission unit is operating except for periods of CEMS calibration checks, zero span adjustment, and preventative maintenance as described in the preliminary monitoring plan submitted to the Department and as determined during certification. Notwithstanding such exceptions, in all cases obtain valid data for at least 75% of the hour per day, 75% of the days per month, and 90% of the hours per quarter during which the emission unit is operational.*

***Based on the above comments, MassDEP has modified TVOP #1-O-10-038, Table 4a, condition #6 and #7 to state the following:***

***In accordance with DEP Approval #1-P-95-011 (6/8/95 & 11/27/95) and Regulation 310 CMR 7.00 Appendix C(9)(b)3, ensure that the NO<sub>x</sub> and NH<sub>3</sub> flue gas CEM equipment operates at all times the emission unit is operating, except for periods of CEMs QA/QC activities, maintenance and repair. Except for periods of QA/QC activities, maintenance and repair, in all cases obtain valid data for at least 90% of the hours per calendar quarter during which the emission unit is operating.***

***In accordance with 310 CMR 7.19(13)(b)10. and 310 CMR 7.00 Appendix C(9)(b)3., operate the CO CEM system at all times that the emissions unit is operating except for periods of CEM calibrations checks, zero span adjustment, and preventative maintenance as described in the preliminary monitoring plan submitted to the Department and as determined during certification. Notwithstanding such exceptions, in all cases obtain valid data for at least 75% of the hours per day, 75% of the days per month, and 90% of the hours per quarter during which the emission unit is operation.***

The Proposed Operating Permit also contains updates concerning the Massachusetts Clean Air Interstate Rule, 310 CMR 7.32, the Massachusetts CO2 Budget Trading Program, 310 CMR 7.70 and the Massachusetts Greenhouse Gas Reporting Program, 310 CMR 7.71.

Attached for your review is the Proposed Operating Permit. It lists the applicable Federal and State Air Pollution Control Requirements and what is required of the facility in order for it to be considered in compliance with such applicable requirements.

Once EPA receives the Proposed Operating Permit, there is a minimum of 105 days before the Department can issue the FINAL permit. This period may be longer depending on objections from EPA and petitions from citizens. Should there be any issues raised during this period by EPA, the Department will notify you of any actions necessary. This time period in no way alters your facility's "application shield" nor the requirement for the facility to be operated in accordance with this Proposed Permit.

If you have any questions concerning this Proposed Operating Permit, please contact Cortney Danneker at (413) 755-2234.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

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Marc Simpson  
Air Quality Permit Chief  
Western Region

ecc: Donald Dahl, USEPA Region 1  
Yi Tian, MassDEP, Boston  
Marc Wolman, MassDEP, Boston